



Dean Boland <deanboland@gmail.com>

Steps taken to preserve evidence

1 message

Dean Boland <dean@bolandlegal.com>

Wed, Nov 23, 2011 at 6:09 PM

To: Alexander Southwell <asouthwell@gibsondunn.com>, Oren Snyder
<osnyder@gibsondunn.com>, Isimpson <Isimpson@orrick.com>, mcooper@orrick.com

To All:

As of approximately an hour ago, all of you have been informed in detail, by email, of the need to take all necessary steps to preserve the evidence currently in the possession of Parmet and Associates related to the ConnectU litigation against your clients, Mark Zuckerberg and Facebook.

I anticipate a response by no later than Friday at noon, given the holiday tomorrow, of the steps you have taken to preserve the evidence. Despite the lack of a need for a litigation hold to trigger a duty of a lawyer to preserve evidence, a litigation hold letter was in fact sent to and its receipt acknowledged by Ms. Simpson early on in this litigation. It is Plaintiff's expectation that you all intend to honor that duty and all other duties to preserve evidence in this case.

Please advise.

Dean Boland.

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Please note, I typically only review my emails once daily. If there is something urgent in any email, please do not hesitate to contact my office at [216-236-8080](tel:216-236-8080).